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Lower Willamette Group

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September 27, 2002

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RE: Upstream Sampling Area Approach for the Portland Harbor Superfund Site

Dear Wally, Chip and Tara:

The LWG is transmitting this letter to inform EPA of our intent to collect upstream area tissue samples as part of the Round 1 sampling effort. We regret that the LWG, EPA, and its partners could not reach consensus on a upstream area sampling approach. However, it is the LWG's position that significant benefit can be derived from exploratory sample collection and analysis. For example, the recent EPA guidance on use of background data indicates that cleanup levels are generally not set at concentrations below natural or anthropogenic background levels under CERCLA (USEPA 2002). Therefore, information on upstream area tissue concentrations is important, along with the results of the risk assessment, for making management decisions for the Portland Harbor Superfund Site.

Upstream area samples will also provide essential information to help in understanding the difference between site-related versus river-wide issues. As you know, the LWG is currently conducting an extensive tissue sampling program within the ISA, which has been approved by

EPA, to address data gaps identified through the DQO process. Due to potential temporal (i.e., annual) differences in tissue concentrations that may exist, the LWG believes it is essential to couple this work with the Round 1 collection effort.

There are several reasons why upstream area samples will be collected in conjunction with the Round 1 sample event in the ISA for the Portland Harbor Superfund Site.

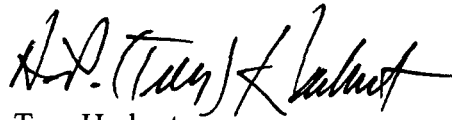
1. Potential sources of chemicals exist upstream of ISA
2. Chemicals from upstream sources may contribute to risks in ISA
3. Information from the upstream area samples could be used in a weight-of-evidence approach to design Round 2 and help focus subsequent site evaluations
4. Upstream fish tissue concentrations from previous studies show potential risks to human health and must be considered during any ISA sample event.
5. During the FS, setting cleanup levels for the ISA lower than upstream sampling area levels could lead to recontamination and would likely not result in risk reduction from the added cleanup actions.

The LWG has selected two upstream area locations for sampling fish tissue during Round 1. The first upstream sampling area is at RM 21. This upstream sampling area was selected to better understand upstream area tissue concentrations directly above the ISA yet below influences of sources unrelated to the ISA. The second upstream sampling area is in the Newberg Pool upstream of Willamette Falls. This upstream sampling area was selected to better understand upstream area tissue concentrations related to sources above the Falls. Both upstream sampling areas exhibit similar habitat characteristics and similar fish species as are found in parts of the ISA, yet are outside the influence of COPC sources from the ISA and outside the home range of the selected fish species that utilize the ISA. The LWG will analyze both wholebody carp and smallmouth bass for the same suite of chemicals analyzed in the ISA wholebody carp and smallmouth bass. We will analyze the tissue using the same approved procedures and protocols as presented in the EPA approved Round 1a FSP, Round 1 SOPs and revised QAPP.

The results of the upstream area tissue sampling effort will be useful to the expedited RI/RA/FS process. Results of upstream area sampling may be useful in designing future sampling events, as the upstream area samples may assist in evaluating the contribution of potential exposure routes for fish. To complete the RI/RA/FS in a timely fashion, it is critical to obtain the information that upstream area samples will provide as early in the process as possible. Results of upstream area sampling effort will also be used in several management decisions during the RI/RA/FS and must be collected in a timely manner for consideration at each management decision point. We will ultimately need to understand upstream sampling area contributions when making risk management decisions for cleanup and recontamination potential.

Again, we regret that consensus on upstream area sampling could not be reached. However, the LWG intends to proceed, in good faith, with sampling that we think will provide useful information for identifying future data needs for the RI and FS. We invite EPA and/or its partners to observe the sampling and review the resulting data.

Please give either of us a call if you have any further questions or concerns.



Trey Harbert
Co-Chair



Bob Wyatt
Co-Chair

cc: LWG Executive Committee
LWG Legal Committee

Reference

USEPA, 2002. Role of Background in the CERCLA Cleanup Program. OSWER 9285.6-07P
May 1, 2002.